IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

HLFIP HOLDING, INC. d/b/a SMART COMMUNICATIONS IP HOLDINGS,

    Plaintiff,

    v.

YORK COUNTY, PENNSYLVANIA; **YORK COUNTY PRISON;** and **CLAIR DOLL**, *in his official capacity as York County Prison Warden*,

    Defendants.

CIVIL NO. 1:20-cv-00186-CCC

Judge Christopher C. Conner

PLAINTIFF'S ANSWER TO DEFENDANTS' COUNTERCLAIM FOR DECLARATORY JUDGMENT

Plaintiff HLFIP Holding, Inc. d/b/a Smart Communications IP Holdings ("Smart Communications") answers the allegations of Defendants York County, York County Prison, and Clair Doll in his official capacity as York County Prison Warden ("Counterclaim Plaintiffs") Counterclaim ("Counterclaim") (Dkt. 28) as follows. Unless specifically admitted, Smart Communications denies each and every allegation in the Counterclaim.

1.   Smart Communications admits that the Counterclaim purports to seek a declaratory judgment under the Declaratory Judgment Act, 28 U.S.C. §§ 2201,

2202 and the Federal Rule of Civil Procedure 13 but denies the Counterclaim has any merit.

2.   Smart Communications admits the allegations in Paragraph 2 of the Counterclaim.

3.   Smart Communications does not contest that, for the limited purpose of this action, the Court has personal jurisdiction over Smart Communications, and that venue for this action is proper.

4.   Smart Communications is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 of the Counterclaim and therefore denies them.

5.   Smart Communications admits that an actual, justiciable controversy exists between Counterclaim Plaintiffs and Smart Communications regarding Counterclaim Plaintiffs' infringement of Smart Communications's valid U.S. Patent No. 10,291,617. To the extent additional allegations exist in Paragraph 5, Smart Communications denies them.

6.   Smart Communications denies the allegations in Paragraph 6 of the Counterclaim.

7.   Smart Communications denies the allegations in Paragraph 7 of the Counterclaim.

8.   Smart Communications denies the allegations in Paragraph 8 of the Counterclaim.

9.   Smart Communications denies the allegations in Paragraph 9 of the Counterclaim.

10.   Smart Communications denies the allegations in Paragraph 10 of the Counterclaim.

RESERVATION OF RIGHTS

Counterclaim Plaintiffs' reservation of rights does not require an admission or denial.

PRAYER FOR RELIEF

Smart Communications denies that Counterclaim Plaintiffs are entitled to any of the requested relief in the Counterclaim and further denies any allegations contained in Paragraphs A through E in the Prayer for Relief to which a response is required.

Dated: December 29, 2020   Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing

Plaintiff's Answer to Defendants' Counterclaim for Declaratory Judgment to be

served via CM/ECF and sent via email to the following recipients on December 29,

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